

1 BY MS. TUGMAN:

2 Q. Do you know if that document describes the
3 actual installation of materials from that delivery
4 order?

5 MR. GINGRAS: That document can Exhibit 15?

6 MS. TUGMAN: Yes.

7 THE WITNESS: This document says that there
8 are a quantity of items that go into a particular job
9 that a government official said would go into that
10 job. Now, if that was -- it calls out specifically
11 100 each schedule 40, one-inch pipe. I don't know if
12 that was 101 feet or if it was 99, but he called it
13 out at 100. I had no reason to doubt him. That is
14 what he paid us by, is by that quantity.

15 BY MS. TUGMAN:

16 Q. Right. Do you know if in fact the
17 quantities described on that document were what
18 were -- what was installed on the project?

19 A. I don't know that for sure. I would think
20 that if it was terribly different, that GMW would
21 have told us.

22 Q. Does that document call for a programmable
23 fire alarm, a programmable a fire alarm system?

24 MR. GINGRAS: That document being Exhibit
25 15?

1 projects, the fire alarm was too high. As he's a
2 licensed electrician and has done quite a bit of
3 stuff, he had a pretty good feel that it was
4 overpriced. So that may have, you know, necessitated
5 the drop.

6 Q. Okay. So it may have been a request from
7 him?

8 A. Might have been.

9 Q. Okay. Now, Mr. Young, your signature here
10 is on page -- Exhibit 37, I think, which is another
11 engineer's estimate for a delivery order; is that
12 correct?

13 A. Correct.

14 Q. And I think maybe you signed most of the
15 engineer's estimates for delivery orders in this
16 project. Could that be the case?

17 A. Certainly if they came to our office, say
18 Bill was out or -- yes, I would have. I certainly
19 would have to keep the ball rolling, so to speak.

20 Q. Did you do any computations or other
21 calculations or do anything other than just sign the
22 documents presented to you by Mr. Frere?

23 A. I would -- if it meant going to the site to
24 verify his quantities, no.

25 Q. Okay. See, we're just rolling right

1 GMW. Is that a true characterization?

2 MR. GINGRAS: Object to form.

3 Argumentative, mischaracterizes the evidence.

4 THE WITNESS: As I remember the situation,
5 we -- if we had an issue that needed more money, for
6 instance, say an oddball, atypical scenario, then
7 Steve Frere would say, "Well, you need about this
8 much money. Let's give you that much money somehow
9 or another through the line items."

10 BY MS. TUGMAN:

11 Q. So sometimes a specific number on an
12 estimate might not be correct because it was supposed
13 to cover other stuff?

14 A. It was almost always correct until -- and
15 for instance, I would say you might take something
16 like submittals and maybe increase that quantity.
17 I'm just speaking off the top of my head. And that
18 would allow for -- say I've got to put some ceiling
19 tile in here. Well, there is no ceiling tile in this
20 particular project, so I have to replace some -- so,
21 you know, I got -- you know, it was an understanding
22 between the government and us.

23 Q. And you were basically using, as opposed to
24 line items, the bottom line total on --

25 A. Yes.